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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

**YADIRA VARGAS TIRADO,**

**Debtor.**

CASE NO: **16-08946-BKT**

CHAPTER: **13**

**DLJ Mortgage Capital, Inc,**  
Movant,

**YADIRA VARGAS TIRADO,**

Debtor-Respondent,

**José Ramón Carrión Morales,**  
Trustee.

**MOTION REQUESTING ENTRY OF ORDER AUTHORIZING PARTIES TO CONDUCT LOSS  
MITIGATION NEGOTIATIONS AND/OR LOAN MODIFICATIONS**

**TO THE HONORABLE COURT:**

COMES NOW MOVANT, **DLJ Mortgage Capital, Inc**, hereinafter referred to as "DLJ", through the undersigned attorney, and very respectfully alleges and requests:

1. DLJ has received from the Debtor a completed Assistance Review Application in order to be evaluated by DLJ for loss mitigation alternatives.
2. In consideration of the aforementioned, DLJ hereby requests this Honorable Court to enter an order authorizing DLJ and Debtor (collectively hereinafter the "Parties") to engage in loss mitigation negotiations.
3. As to that effect, we hereby respectfully request that an order allowing the Parties to engage in loss mitigation negotiations be entered.

Case No. 16-08946-BKT  
Informative Motion

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**WHEREFORE**, DLJ respectfully requests from this Honorable Court to take notice of the aforementioned and enter any ruling that it may find appropriate as to the same.

**NOTICE TO ALL PARTIES IN INTEREST**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise. If no response is filed within the prescribed period of time the Court may enter an order granting the relief herein requested.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Chapter 13 Trustee, José Ramón Carrión Morales and to the Debtor's/Debtors' attorney, Roberto Figueroa Carrasquillo.

In San Juan, Puerto Rico, this 17<sup>th</sup> day of January, 2018.

**MARTINEZ & TORRES LAW OFFICES, P.S.C.**

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/s/ Patricia I. Varela Harrison

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